

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Case No. **1:21-MJ-00888**

Priority Mail Express, Label Number EE 203385518 US, addressed to
S. Johnson, 3514 Harvey Ave. APT #4, Cincinnati, Ohio 45229, with
a return address of William Lemus, 246 E. 29th ST, L.A. Ca. 90011.

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Priority Mail Express, Label Number EE 203385518 US, addressed to S. Johnson, 3514 Harvey Ave. APT #4, Cincinnati, Ohio 45229, with a return address of William Lemus, 246 E. 29th ST, L.A. Ca. 90011.

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.


The search is related to a violation of: Title 21

Code Section	Offense Description
21 U.S.C. 841 (a) (1)	Possession with intent to distribute a controlled substance

The application is based on these facts:

See attached affidavit of U.S. Postal Inspector Alan J. Wilkins

- ☒ Continued on the attached sheet.
- ☐ Delayed notice _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

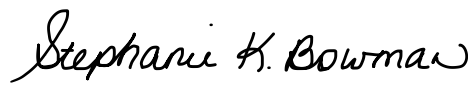

Applicant's signature

Alan J. Wilkins, U.S. Postal Inspector
Printed name and title

Sworn to before me and signed in my presence.
via electronic means, specifically Facetime video.

Date: Nov 18, 2021

City and state: Cincinnati, Ohio


Judge's signature

Stephanie K. Bowman
United States Magistrate Judge
Printed name and title



AFFIDAVIT

I, Alan J. Wilkins, having been duly sworn, depose and state:

1. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS), assigned to the Cincinnati, Ohio Field Office. I have been employed by the United States Postal Inspection Service since June 1, 2013. I have investigative responsibility for southwest Ohio and northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. I have gained experience through completion of the Basic Inspector Training (BIT) in August of 2013. During BIT training, I was instructed in all phases of criminal investigation such as: criminal law, search and seizure, field enforcement techniques, firearms proficiency, drug and narcotics identification, drug and narcotics field testing, interviewing and evidence collection. Since June 2013 I have worked with various federal, state, and local law enforcement agencies in the prosecution of crimes involving the U.S. Mail and the U.S. Postal Service including but not limited to mail fraud, bank fraud, mail theft, burglaries, robberies, homicides, dangerous mail investigations, and mailed narcotics.
3. This Affidavit is made in support of a search warrant for the following property, namely the package associated with the following United States Postal Service ("USPS") Priority Mail Express Label Number:

a. **EE 203385518 US (the "Subject Package")**

This Affidavit is made in support of a warrant to search the **Subject Package** for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offense:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841.

Because this Affidavit is submitted in support of the application of the United States to search the **Subject Package**, it does not include every fact known concerning this investigation. I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the **Subject Package**. The **Subject Package** is currently being held at the USPIS Cincinnati Field Office.

4. Based on my training and experience, I have become aware that drug traffickers frequently use Priority Mail Express and/or Priority Mail, services offered by the USPS, to transport narcotics and other dangerous controlled substances. As a result of investigations and successful controlled substance prosecutions where Priority Mail Express and/or Priority Mail were used, I have learned of certain characteristics

associated with other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other dangerous controlled substances. Some of these characteristics include (but are not necessarily limited to or used on every occasion): false or non-existent return address, addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

5. On or about November 18, 2021, I identified and intercepted the **Subject Package** from the Cincinnati Processing and Distribution Center located within the Southern District of Ohio.

The **Subject Package** is further described as:

Priority Mail Express, Label Number: EE 203385518 US

Weighing approximately 2 pounds in a brown box with approximate dimensions of 10''x8''x6''. Postage paid was \$61.25.

Sender: William Lemus
246 E. 29th ST
L.A. Ca. 90011
(323)675-9310

Addressee: S. Johnson
3514 Harvey Ave. APT #4
Cincinnati, Ohio 45229

6. I observed the **Subject Package** and reviewed USPS tracking information, which indicated it was mailed from the Los Angeles Main Post Office, Los Angeles, CA 90001, on November 16, 2021. The **Subject Package** is heavily taped.
7. I searched the CLEAR database for the listed return address of the **Subject Package**. CLEAR is an investigative platform available to law enforcement and other government investigators that contains public-record data about people and businesses. The information obtained from the system indicated that William Lemus is not associated with that address.
8. I searched the CLEAR database for the listed addressee of the **Subject Package**. The information obtained from the system indicated that there is no S. Johnson associated with that address.
9. I searched the CLEAR database for the listed telephone number on the **Subject Package**. The information obtained from the system indicated that there is no association with the listed telephone number and William Lemus or S. Johnson.

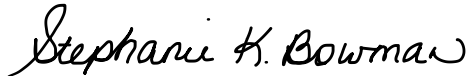
10. On or about November 18, 2021, I arranged for Deputy Nick Poole, Hamilton County Sheriff's Office, to utilize a narcotics canine to check the **Subject Package**. Deputy Poole and his canine "Akim" are a currently certified narcotics team. The team is certified by the Ohio Peace Officer Training Commission and the Ohio Office of the Attorney General. Deputy Poole reports that "Akim" passed all of his examinations and has successfully located hidden drugs in the past; I therefore consider "Akim" to be reliable. I met Deputy Poole at the USFIS Cincinnati Field Office, where the **Subject Package** was placed in a separate office among several other similar packages and presented to "Akim", who alerted positively to the presence or odor of a controlled substance upon the **Subject Package**. Attached to this Affidavit, and incorporated by reference, is a photocopy of the narcotic canine handler's record of examination.
11. Based upon my experience and training, this information, along with the positive alert of narcotic canine "Akim," is indicative of the **Subject Package** containing narcotics or proceeds relating thereof.
12. Based upon the information contained in this Affidavit, I believe that there is probable cause to believe that the **Subject Package** will contain evidence and/or contraband, fruits of crime, or other items illegally possessed. Therefore, a search warrant to open the **Subject Package** is requested.

Further, your Affiant sayeth naught.



Alan J. Wilkins
U.S. Postal Inspector

Subscribed and sworn to and before me this 18th day of November 2021.
via electronic means, specifically Facetime video.



Stephanie K. Bowman
United States Magistrate Judge





United States Postal Inspection Service
Pittsburgh Division

OFFICER AFFIDAVIT


I, DEPUTY N. POOLE, AM, AND HAVE BEEN, EMPLOYED BY THE HAMILTON COUNTY SHERIFF'S OFFICE, SINCE 2004. AMONG OTHER DUTIES, I AM CURRENTLY THE ASSIGNED HANDLER OF NARCOTICS DETECTION CANINE "AKIM", WHICH IS TRAINED AND CERTIFIED IN THE DETECTION OF THE PRESENCE OR ODOR OF NARCOTICS DESCRIBED AS FOLLOWS:

Marijuana, Cocaine, Heroin, Methamphetamines, and their derivatives.

ON 11/18/2021, AT THE REQUEST OF POSTAL INSPECTOR A.J. WILKINS I RESPONDED TO THE USPIS CINCINNATI FIELD OFFICE WHERE "AKIM" DID ALERT TO AND INDICATE UPON THE FOLLOWING DESCRIBED ITEM:

USPS Priority Mail Express, USPS Label Number: EE203385518US, addressed to: S. Johnson, 3514 Harvey Ave APT #4, Cincinnati, Ohio 45229 with a return address of William Lemus, 246 E. 29th ST, L.A. Ca 90011.

BASED ON MY TRAINING AND EXPERIENCE AND THAT OF "AKIM", I CONSIDER THE ABOVE DESCRIBED ITEM TO CONTAIN WITHIN OR UPON THE PRESENCE OR ODOR OF A NARCOTIC OR OTHER DANGEROUS CONTROLLED SUBSTANCE.


(Signature and Date) 11/18/21 #1435